

# ARCS

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## Remedial Activities at Uncontrolled Hazardous Waste Sites in the Zone of Regions VI, VII, VIII



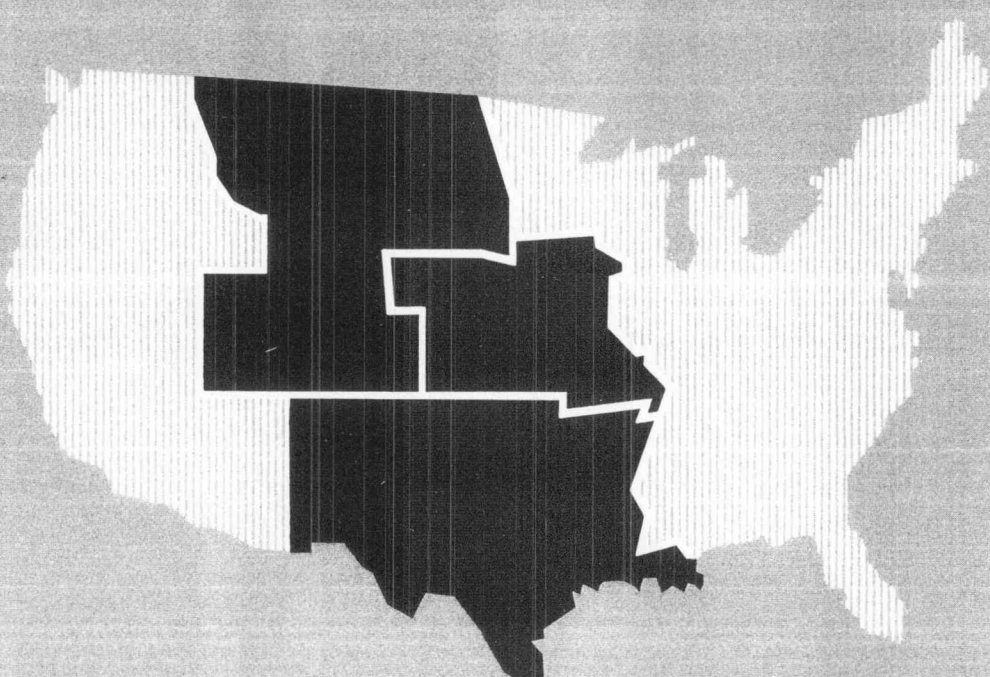
Contract No. 68-W8-0112

United States  
Environmental Protection Agency

Dallas Housing Authority  
Oversight Plan

Dallas Housing Authority  
Operable Unit No. 2

ARCS Contract No. 68-W8-0112  
EPA Work Assignment No. 68-6P2H  
July 30, 1993



**CH2M HILL**

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**Section 1**  
**Oversight Plan Overview**

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## **Section 1**

# **Oversight Plan Overview**

### **Introduction**

This Oversight Plan was prepared for the United States Environmental Protection Agency (EPA), Region VI, in response to Work Assignment No. 68-6P2H under Contract No. 68-W8-0112 for the Dallas Housing Authority (DHA) at Operable Unit (OU) No. 2 of the RSR Corporation Superfund Site located in Dallas, Texas. The Oversight Plan covers oversight activities associated with the implementation of the Administrative Order of Consent (AOC) between EPA and DHA. EPA is currently negotiating the AOC with the DHA for the remedial investigation/feasibility study (RI/FS) and Remedial Action activities at locations under DHA's jurisdiction. Field activities associated with OU No. 2 are described in the RI Work Plan for DHA's West Dallas Development and in the Removal Action Plan for DHA. The field activities will be finalized upon signature of the AOC and submittal of the final work plans and sampling analysis plans (SAP).

### **Scope**

This Oversight Plan describes the methods and policies for overseeing fieldwork and document reviews for activities conducted by the DHA at OU No. 2 at the RSR Corporation Superfund site. It provides general information and procedures and addresses the role of CH2M HILL in field oversight, communications, documentation, site access, and health and safety. It also provides information on the general scope and type of technical document reviews. The remainder of this section describes the purpose of technical oversight activities and provides the site background. Section 2

presents the oversight activities pertaining to the RI/FS and Section 3 presents the oversight activities pertaining to the Removal Action.

### **Purpose of Oversight**

Two types of oversight activities have been identified. The first type pertains to field oversight activities associated with the RI/FS and the Removal Action. The second type pertains to conducting reviews of DHA technical documents and providing technical support to EPA. The primary purposes of the oversight work associated with the OU No. 2 RI/FS and Removal Action are to:

1. Document the observed procedures employed by the DHA and to inform EPA whether, in CH2M Hill's judgment, the observed procedures are consistent with the AOC and with the EPA-approved RI Work Plan, Removal Action Plan, and other planning documents (i.e., SAP, QAPP, FSP, etc.).
2. Document the schedule of observed activities performed in the field.
3. Provide periodic independent checks of the DHA's field activities.
4. Provide reviews of documents developed by DHA for compliance with the AOC and other relevant planning documents.

Secondary purposes are to observe and gather site information to maintain a knowledge of the work performed and as reference for review of future work products, and to allow technical recommendations to be made concerning the project approach. This will aid in coordination activities with other site OUs.

The field oversight personnel's primary role is to observe the DHA work, and identify and report to EPA any observed potential deviations from approved procedures for appropriate action, or report pertinent observations to EPA.

It is not CH2M HILL's responsibility during field oversight to ensure that the DHA follow the procedures in EPA-approved work plans. Rather, it is CH2M HILL's responsibility to observe portions of the field work, to adequately prepare documentation describing the observed procedures used by DHA, and to identify to EPA any observed potential deviations from EPA-approved work plans. It is EPA's responsibility to follow up with the DHA to ensure that approved procedures are followed or modified as appropriate.

During performance of the work, situations may occur where DHA may deviate from specified procedures. These potential deviations should be addressed according to the procedures specified in the AOC or other appropriate documents governing the conduct of the work. CH2M HILL will not authorize deviations from EPA-approved work plans and planning documents, as this responsibility resides with EPA.

## **Background**

The RSR Corporation Superfund Site is located in a primarily residential/light industrial section of west Dallas, just south of the Trinity River. From 1934 until 1971, a lead smelting facility located near the approximate center of the site was operated by Murph Metals, Inc. and its predecessors. In 1971, RSR Corporation acquired the lead smelting operation and established Murph Metals as an operating subsidiary. The facility continued to operate under RSR Corporation until March 1984 by the current owner, Murmur Corporation. The Murmur Corporation facility consists of the smelter facility and a manufacturing and fabricating producing facility producing lead shot and foil.

As a result of a lawsuit brought by the City of Dallas and the Texas Air Control Board against RSR Corporation in 1983, the company was required to take corrective measures at the facility, which included installation of stack emission controls. RSR Corporation was also required to fund a cleanup of the residential community within 1/2-mile of the smelter. The cleanup, conducted in 1984 through 1985, required the removal of soils in the residential areas where analytical results indicated lead concentrations greater than 1,000 ppm. The soils were removed to a depth of 6 inches, replaced with clean fill, and covered by sod. Soils from public play areas, day care centers, and residential gardens were removed to a depth of 12 inches and replaced with washed sand or clean soil. It should be noted that the cleanup level of 1,000 ppm was considered a safe and appropriate level at that time.

Also in 1983, the City of Dallas declined to renew the operating permit for the smelter. This decision was based on the facility's historical operational practices and City zoning ordinance restrictions. As a result, the smelter facility closed in 1984.

Concerns about lead contamination in the west Dallas area re-emerged in 1991 when the Texas Water Commission (TWC) began receiving complaints from area residents about slag piles and battery chips allegedly originating from the former RSR Corporation facility. TWC requested that EPA re-evaluate the activities completed in the area during the 1980s and become involved in the current site activities.

Soil sampling conducted by EPA in 1991 verified the presence of soil lead contamination greater than 500 ppm in residential areas surrounding the smelter facility and the use of battery chips and slag as fill materials. As a result, EPA initiated a removal action in the residential area adjacent to the smelter. Cleanup levels for this removal action are 500 ppm lead, 20 ppm arsenic, and 30 ppm cadmium. In addition, the TWC initiated a door-to-door residential survey and sampling investigation in 1992 to ascertain the location of areas where battery chips and slag were used as fill and to determine soil contamination levels in those areas. The TWC investigation and EPA removal action are completed, with the final reports available in the near future.



On May 10, 1993, the EPA announced the proposal of the RSR Corporation Site to the National Priorities List (NPL) of Superfund sites. The site received a score of 50.0 based solely on the soil exposure pathway. Fallout from historical air emissions resulted in contamination of properties near the site. In addition, the use of battery chips and slag as residential fill materials is believed to be a significant route of exposure to the residential population in the area.

The RSR Corporation Superfund Site is currently divided into five OUs. The boundaries of the RSR Corporation and OU No. 2 are presented in Figure 1-1. This Oversight Plan covers activities associated with OU No. 2. Operable Unit No. 2 includes single and multi-family public housing developments completed in 1958 and is under the jurisdiction of the DHA. The property is bounded by Westmoreland Road to the west, Hampton Road to the east, Canada Drive and the West Fork of the Trinity River to the north, and Singleton Boulevard to the south.

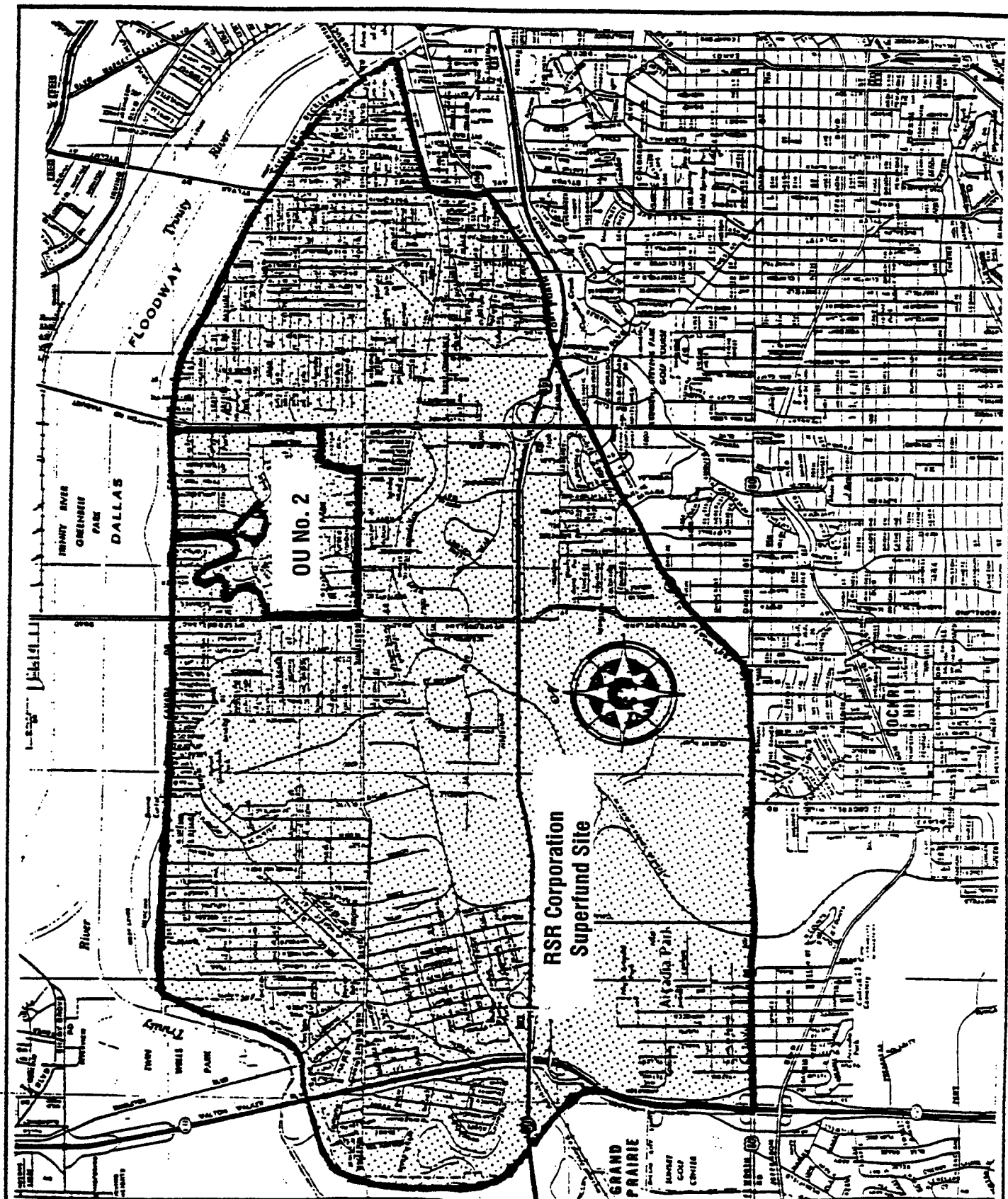


Figure 1-1  
RSR CORPORATION  
SUPERFUND SITE AND OU NO. 2

**Section 2**  
**RI/FS Oversight Plan**

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## **Section 2**

# **RI/FS Oversight Plan**

This section describes the oversight activities associated with the conduct of DHA's RI/FS for OU No. 2 of the RSR Corporation Superfund site. The following topics are described:

- Role of Oversight Personnel
- Field Oversight Inspections
  - Lines of Communication
  - Oversight Logbooks
  - Photograph Logbooks
  - Review of DHA Field Documentation
  - Sample Splits
  - Oversight Reports
- Health and Safety
- Quality Control
  - Review of Oversight Documentation
  - Field Visits
- Site Access
- Review of DHA Documents

## **Role of Oversight Personnel**

CH2M HILL's role, as specified in this document, during the course of oversight activities will be to monitor the DHA fieldwork associated with the RI/FS for OU No. 2 and review DHA documents for AOC compliance. The principle activities of the oversight personnel are as follows:

1. Document observed procedures employed by DHA with respect to the EPA-approved work plans and planning documents covering the activity in question. To accomplish the appropriate documentation, oversight personnel will perform the following activities:
  - Become familiar with the requirements of the activity prior to oversight (that is, review governing documents, sampling plans, and so forth).
  - Observe selected field activities including portions of soil boring completion and sampling, groundwater well installation and sampling, surface soil sampling, surface water sampling, sediment sampling, and ecological investigations.
  - Prepare documentation of the procedures followed by DHA, to the extent necessary, to allow independent evaluation of whether the procedures employed meet the requirements of EPA-approved work plan and planning documents. Logbooks and field oversight forms that will be used to accomplish this objective are described later in this section.
  - Photograph observed procedures or activities as necessary to document critical aspects of the work and to document proce-

dures or activities that potentially deviate from the approved plans. Photographs will be documented as described later in this section. The number of photographs taken will be limited to those necessary to meet the defined objective.

2. Document via the use of field logbooks, the schedule of activities performed in the field by DHA, and describe which activities were observed.
3. Perform periodic independent measurements of physical and chemical parameters as checks of the DHA field activities. These may include the following:
  - Collect split samples for analysis through EPA's Contract Laboratory Program to verify the results of DHA analyses for surface water, sediment, soil, and groundwater samples.
  - Perform periodic measurements of field parameters (such as pH, temperature, and conductivity) to verify the DHA measurements.
  - Observe a sufficient number of repetitive tasks (for example, 3 out of 12 sediment samples) to evaluate if the procedures specified in the EPA-approved work plans and planning documents are followed.
  - Check to see if the DHA field forms are used as specified in their sampling analysis plan (SAP) and field sampling plan (FSP).
  - Make observations (and record descriptions in the field logbook) of samples collected by DHA. For example, prepare indepen-

dent field descriptions of lithology of core samples to compare with the DHA description.

4. Review documents developed by DHA for compliance with the AOC and other planning documents.

Additionally, oversight personnel responsibilities include the following:

1. Maintaining an understanding of the AOC and EPA-approved work plans and planning documents.
2. Understanding the lines of communications to be used as part of field oversight.
3. Maintaining documentation regarding observed oversight activities and communications that may take place.
4. Consulting with appropriate support and management personnel regarding situations that arise during oversight activities that require special action.
5. Performing duties in a professional, responsible, and nonconfrontational manner.
6. Making no comment to DHA on the adequacy of work or suggesting alternate means of performing the work, obstructing the progress of the work, or getting involved in health and safety aspects of the work performed by DHA.
7. Authorizing no deviations from EPA-approved work plans or planning documents.

8. Undertaking no DHA responsibilities.
9. Providing no advice, issuing no directions regarding, or assuming no control over any aspect of the DHA activities for the OU No. 2 RI/FS.

It is important to CH2M HILL and EPA that oversight personnel maintain a monitoring/oversight role versus a directing or approval posture. DHA is responsible for executing the work as specified in the AOC and for determining and properly executing any needed changes or modifications.

### **Field Oversight Inspections**

This section provides information regarding the lines of communication, oversight logbooks, photograph logbooks, review of DHA documentation, sample splits, and reporting for field oversight of DHA's RI/FS activities at OU No. 2.

#### **Lines of Communication**

Communication procedures exist between oversight personnel and DHA, the EPA remedial project manager (RPM) for the OU No. 2, the news media or other outside parties, and the CH2M HILL site manager and appropriate support and management personnel.

All inquiries from the news media will be referred to the EPA RPM for responses.

Oversight personnel should coordinate with the DHA site manager (individual identified to direct the fieldwork onsite) regarding scheduling specific field activities. Oversight personnel making observations considered to be potential deviations from



specified field procedures or questioning the appropriateness of observed procedures should perform the following:

1. Discuss the procedure(s) in question with the DHA site manager or appropriate representative and describe the communication in the field logbook (that is, record who was present during the conversation along with the time, date, and substance of the communication).
2. Contact the CH2M HILL site manager and discuss the potential deviations or procedure in question. Depending upon the results of this discussion, a Potential Deviation Report should be sent to the EPA RPM.

In the event oversight personnel and the CH2M HILL site manager determine that a procedure used by DHA is a potential deviation, a Potential Deviation Report (Figure 2-1) will be communicated/transmitted to the EPA RPM (or designate) within 1 working day after it was observed.

### **Oversight Logbooks**

Oversight logbooks will be bound with pages consecutively numbered. Logbooks will be checked out from the CH2M HILL site manager at the beginning of each major phase of oversight activity. If multiple oversight personnel are on site, each observer will have a separate oversight logbook in their possession. Separate logbooks (from other OU activities) will be maintained for oversight of work related to this OU RI/FS. The logbooks will remain in the possession of oversight personnel or in a secured onsite area, or at CH2M HILL's Dallas office. Logbooks will be returned to the CH2M HILL site manager at the conclusion of each phase of field activity, or if oversight personnel changes.

**Figure 2-1**  
**POTENTIAL DEVIATION REPORT**  
**RSR OU NO. 2**

DATE: \_\_\_\_\_

ATTACHMENT TO DAILY LOG DATED: \_\_\_\_\_ SHEET \_\_\_\_\_ OF \_\_\_\_\_

ACTIVITY: \_\_\_\_\_ PROJECT NO: \_\_\_\_\_

CONTRACTOR: \_\_\_\_\_

OBSERVED POTENTIAL DEVIATION: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

REFERENCE TO SAMPLING PLAN OR DOCUMENT SITED FOR POTENTIAL DEVIATION: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

EPA ACTION RECOMMENDED: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

EPA HAS BEEN NOTIFIED BY:  
☐ YES ☐ NO ☐ VERBALLY ☐ IN WRITING

DAILY LOG DATED: \_\_\_\_\_  
DATE: \_\_\_\_\_

DEVIATION HAS BEEN CORRECTED  
BY: \_\_\_\_\_

DAILY LOG DATED: \_\_\_\_\_  
DATE: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

PREPARED BY: \_\_\_\_\_

CH2M HILL, INC.

The oversight logbook will be used for all oversight entries, except photographs. Photographic information will be entered into a photograph record file. Specific observations to be noted will vary depending on the type of field activity.

All entries must be made with permanent ink and each page must have the date and signature of the author. Field logbook errors will be corrected by drawing a single line through the error and initialing and dating the correction. Records should contain sufficient information so observations are clearly presented and understandable. Each individual who writes in the oversight logbook will date and sign their entry. The types of items included in the logbook will record the following:

- Name(s) of oversight personnel
- Date and time (start and finish of oversight)
- Type of activity being observed
- Sample location or description, such as well or borehole number, or decontamination activity
- Names and titles of the DHA lead personnel performing work
- Description of observed activity in sufficient detail to evaluate compliance with EPA-approved work plans or planning documents
- Description of observed problems encountered by DHA and actions taken
- Description of observed significant procedural departure of DHA from EPA-approved work plans and planning documents

- Description of unusual or severe weather-related conditions that could influence the progress or quality of the work being performed
- Description of significant discussions with DHA or property owner, such as questions asked and the responses, including identification of individuals present during the conversation and the time and date of the conversation

### **Photograph Logbooks**

Photographs taken by oversight personnel will be documented in a photograph record file. Documentation in the photograph record file will be in ink and will be signed and dated. A camera and film will be available to oversight personnel for visual documentation of significant events or objects. Film rolls will be consecutively numbered; the type of film and film ASA will be noted at the beginning of each roll of film. The number of photographs taken shall be kept to a minimum and used to the extent needed to document critical aspects of the work and potential deviations from EPA-approved work plans and planning documents.

The type of camera and lens will be entered in the photograph record file for each roll of film. Information to be provided in the photograph record file for each individual photograph taken is:

- Photograph (frame) number and roll number
- Date and time
- Photographer's name
- Location of photograph and direction photographer is facing
- Description of activity/object shown in photograph

This information will also be recorded on the back of the photograph and the individual who took the photograph will sign the photograph. No lens filters (except UV) or lenses other than a 35 or 55 mm shall be employed. When photographing objects closeup, a scale or other measuring device will be included in the photograph.

Two documented copies of each photograph will be made. CH2M HILL will maintain one set in the project files. The other copy, with documentation and the negatives, will be sent to EPA as part of the monthly oversight reports.

### **Review of DHA Field Documentation**

The AOC (Item 40, Draft AOC) allows oversight personnel to periodically inspect nonprivileged records, including sample tracking records (i.e., Chain-of-Custody forms, sample tags, etc.). Oversight personnel will not inform DHA of which paperwork will be inspected until DHA has completed a given set of paperwork and not until immediately prior to evaluating the documentation in question.

Periodically, field documentation collected by DHA will be reviewed for general content and adequacy of documentation and to document that DHA is following requirements of EPA-approved work plans and planning documents. The content and format of this field documentation will be described in the DHA FSP. At least once a week (if samples are collected), EPA oversight personnel will inspect a portion of sample paperwork (one complete sample) to determine if DHA procedures are in conformance with EPA-approved work plans and planning documents. Observations will be appropriately documented in field oversight logbooks.

### **Sample Splits**

The AOC (Item 41, Draft AOC) allows EPA to receive split samples at any time upon request. At EPA's verbal or written request, or the verbal or written request of

EPA's oversight contractor (CH2M HILL), DHA will allow split or duplicate samples to be taken by EPA (and its authorized representatives) of any samples collected by DHA in implementing the AOC and the project plans. It is anticipated that EPA will choose to collect sample splits at various times during fieldwork under this OU RI/FS. Recommendations for splits will be made by CH2M HILL to EPA. After EPA approves the splits, CH2M HILL will inform DHA during site coordination meetings of specific split samples to be collected. Details of the number of splits, the parameters to be analyzed, and the analytical procedures to be employed are described in the following paragraphs.

The proposed sample splits are presented on Table 2-1. Sample splits will be collected at approximately a frequency of 10 percent for each type of sampling event. Additional sample splits may be collected at areas determined to be critical during field activities. The proposed sample splits are based on the Draft DHA RI/FS Work Plan and are provided as an example only. The specific sample splits will be based on the DHA's Final RI/FS Work Plan and Final SAP.

The sample splits will be collected as described in the SAP (FSP and QAPP) developed by CH2M HILL. The CH2M HILL SAP will be based on the final SAP developed by DHA.

Appropriate lead time (approximately 4 weeks) is required to coordinate sample collections with the EPA Sample Management Office (SMO). Oversight personnel will coordinate upcoming sampling schedules with the DHA contractor and inform the SMO of estimated split sample collection dates.

### **Oversight Reports**

It is important that the oversight activities are documented in a manner sufficient for EPA to determine that the fieldwork is performed as required by EPA-approved

work plans and planning documents and also to identify potential problems so they may be rectified early. The following written reports will be prepared:

- Daily summary reports
- Monthly oversight reports

Table 2-1 Proposed Sample Splits					
Media	Number of Analyses in RI Work Plan	Analyses Requested	Proposed Sample Splits	Proposed QC Sample Splits	Analytical Method
Subsurface Borings	~32	TAL Metals	3	none	Method 239.2 M and 200.7 M
	~4	VOAs, BNAs	1	none	Method 624, 625
Groundwater	5	TAL Metals, Dissolved	1	none	Method 200.7 M, 206.2 M, 245.1 M, 270.2 M
	5	TAL Metals, Total	1	none	Method 200.7 M, 206.2 M, 245.1 M, 270.2 M
	5	VOAs	1	Trip Blank	Method 624
	5	BNAs	1	none	Method 625
	5	Water Quality	1	none	Standard Methods
Surface Water	6	TAL Metals	1	none	Method 200.7 M
		Water Quality	1	none	Standard Methods
Sediments	12	TAL Metals	1	none	Method 200.7 M
Total Number	79		12	1	
Note: Groundwater quality parameters include alkalinity, conductivity, and TDS. Surface water quality parameters include BOD, COD, TSS, Total N, nitrate, Total P, and pH.					

At the end of each day in which field oversight occurs, oversight personnel will complete a Daily Summary Report (Figure 2-2). The report contains space for the following entries:

- Date
- Name of oversight personnel

**Figure 2-2**  
**DAILY SUMMARY REPORT**  
**RSR OU NO. 2**

DATE: \_\_\_\_\_ OVERSIGHT PERSONNEL: \_\_\_\_\_

HIGHEST LEVEL OF H&S PROTECTION: \_\_\_\_\_ NO. OF HOURS WORKED: \_\_\_\_\_

1) Description and schedule of activities performed by DHA

2) Description and schedule of activities observed by Oversight Personnel

3) Any known deviations from approved plans, schedule, or procedures (including description of the requirement [Plan No., Section, Page] and the nature of the deviation).

4) Summary of significant communications with the DHA, site operator, or others



**Figure 2-2 (Continued)**  
**DAILY SUMMARY REPORT**  
**RSR OU NO. 2**  
**Page 2**

5) Coordination problems with DHA field personnel

6) Follow-up items for EPA  
(potential deviations, access problems, working relationships, recommendations for technical changes in procedures)

7) Summary of samples/measurements taken by oversight personnel

8) Other

- Highest level of personal health and safety protection
- Number of hours of the work day covered by oversight personnel
- Description and schedule of activities performed by DHA
- Description of activities observed by oversight personnel
- Observed deviations from EPA-approved work plans or planning documents
- Summary of significant communications with DHA or others
- Coordination problems with the DHA field personnel
- Follow-up items for EPA (potential deviations, access problems, working relationships, recommendations for technical changes in procedures)
- Description of samples/measurements taken by oversight personnel
- Other information, as appropriate

Monthly oversight reports will also be prepared summarizing general activities performed during a calendar month. The reports will include one documented copy of the photographs and their negatives taken during oversight. The reports will include the following:

- Overview/summary of the DHA fieldwork overseen and covered in the monthly report

- Summary of potential deviations communicated to EPA
- Changes in procedures due to potential deviations
- Recommendations made for changes in technical approach and whether the changes were incorporated and sufficient
- Summary of sample splits collected and field measurements taken
- General descriptions of working relationship with DHA
- Summary of major technical issues and potential impact on quality of this RI/FS
- Summary of field personnel used and the time each spent in the field
- Access issues
- Daily Summary Reports

Draft reports will be submitted to EPA within 2 weeks after the end of the month. The monthly oversight reports will be finalized after receipt of EPA comments.

### **Health and Safety**

A health and safety plan (HSP) will be developed for the oversight activities. It is the responsibility of oversight personnel to read and abide by the HSP and amendments. The DHA contractors will perform fieldwork and provide monitoring for health and safety purposes. CH2M HILL field oversight personnel will obey all health and safety

directives of the DHA's contractors to the extent that the conditions, if warranted, do not interfere with oversight activities, as well as conform to CH2M HILL's health and safety plan.

Oversight personnel are responsible for having their own required personal protective equipment (PPE) at the work site.

Oversight personnel must complete a 40-hour Hazardous Waste Site Investigation Training course, American Red Cross Multimedia Standard First Aid and Basic Life Support course, and Red Cross or American Heart Association CPR course. In addition, oversight personnel must be in a current medical monitoring program. The documentation of these training requirements will be in possession of the CH2M HILL field oversight personnel.

## **Quality Control**

### **Review of Oversight Documentation**

Copies of all logbook entries sent to the CH2M HILL site manager will be reviewed to determine if the field oversight objectives, as described in this plan, are being accomplished. The site manager will provide the field oversight personnel with the feedback or necessary changes to oversight procedures and documentation. The site manager will also discuss with the EPA RPM potential changes to oversight activities based on the field implementation.

### **Field Visits**

The site manager will make periodic visits to the site to observe operations and discuss issues with the CH2M HILL field oversight personnel and the DHA's contrac-

tors. The purpose of the field visits is to provide quality control reviews by the CH2M HILL site manager. These visits and associated followup will be documented in the oversight field logbooks.

### **Site Access**

As stated in the AOC (Item 42, Draft AOC), EPA and EPA representatives (oversight personnel) will have access to the field areas. The AOC states that at all reasonable times and subject to the compliance of the Site Health and Safety Plan, EPA and its authorized representatives will have the authority to enter and freely move about all property at the site and offsite areas for the express purposes of inspecting conditions, activities, and records.

### **Review of DHA Documents**

The second type of oversight activities pertains to reviewing DHA technical documents for technical soundness and compliance with the AOC and relevant planning documents. The AOC specifies that the DHA shall prepare the following documents for EPA's review:

- Project Work Plan
- SAP
- Site Health and Safety Plan (for information only)
- RI Report
- Summary of Area Demographic Characteristics Memorandum
- Summary of Area Ecological Characteristics Memorandum
- Treatability Testing Work Plan
- Treatability Study Sampling and Analysis Plan

- Treatability Evaluation Report
- Alternative Development and Screening Memorandum
- Nine Criteria Analysis Memorandum
- Remedial Alternative Comparative Analysis Report
- FS Report

In accordance with direction provided by the EPA RPM, CH2M HILL will review and comment on each of the above technical submittals. The schedule and estimated budget for reviewing each document will be established with EPA RPM prior to initiating a review. Comments will be prepared in a technical memorandum format with general comments followed by specific comments. The general comments will pertain to the overall document while the specific comments will identify a specific section, page number, paragraph, and sentence.

**Section 3**  
**Removal Action Oversight Plan**

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### **Section 3**

## **Removal Action Oversight Plan**

Oversight activities pertaining to the Removal Action Plan are primarily field oversight activities. However, the Removal Action Report prepared by DHA summarizing the removal action activities will be reviewed by CH2M HILL as described in Section 2, Review of DHA documents. This section describes the field oversight activities associated with the conduct of DHA's Removal Action for OU No. 2 of the RSR Corporation Superfund site. The following topics are described:

- Role of Oversight Personnel
- Field Oversight Inspections
  - Lines of Communication
  - Oversight Logbooks
  - Photograph Logbooks
  - Review of DHA Field Documentation
  - Sample Splits
  - Oversight Reports
- Health and Safety
- Quality Control
  - Review of Oversight Documentation
  - Field Visits
- Site Access



## **Role of Oversight Personnel**

CH2M HILL's role, as specified in this document, during the course of field oversight activities will be to monitor the DHA fieldwork associated with the Removal Action activities for OU No. 2. The principle activities of the oversight personnel are as follows:

1. Document observed procedures employed by DHA with respect to the EPA-approved work plans and planning documents covering the activity in question. To accomplish the appropriate documentation, oversight personnel will perform the following activities:
  - Become familiar with the requirements of the activity prior to oversight (that is, review governing documents, sampling plans, and so forth).
  - Observe selected field activities including soil sampling at George Loving Place, soil sampling in the Kingsbridge Park area, soil and demolition material testing, verification sampling, and QA/QC sampling.
  - Prepare documentation of the procedures followed by DHA, to the extent necessary, to allow independent evaluation of whether the procedures employed meet the requirements of the EPA-approved work plan and planning documents. Logbooks and field oversight forms that will be used to accomplish this objective are described in this section.

- Photograph observed procedures or activities as necessary to document critical aspects of the work and to document procedures or activities that potentially deviate from the approved plans. Photographs will be documented as described later in this section. The number of photographs taken will be limited to those necessary to meet the defined objective.
2. Document via the use of field logbooks the schedule of activities performed in the field by DHA, and describe which activities were observed.
  3. Perform periodic independent measurements of physical and chemical parameters as checks of the DHA field activities. These may include the following:
    - Collect split samples for analysis through EPA's Contract Laboratory Program to verify the results of DHA analyses for soil sampling and material testing.
    - Observe a sufficient number of repetitive tasks (for example, 10 percent of the soil sampling at each location) to evaluate if the procedures specified in the EPA-approved work plans and planning documents are followed.
    - Check to see if the DHA field forms are used as specified in their SAP and FSP.
  - Make observations (and record descriptions in the field logbook) of samples collected by DHA.

Additionally, oversight personnel responsibilities include the following:

1. Maintaining an understanding of the AOC and EPA-approved work plans and planning documents.
2. Understanding the lines of communications to be used as part of field oversight.
3. Maintaining documentation regarding observed oversight activities and communications that may take place.
4. Consulting with appropriate support and management personnel regarding situations that arise during oversight activities that require special action.
5. Performing duties in a professional, responsible, and nonconfrontational manner.
6. Making no comment to DHA on the adequacy of work or suggesting alternate means of performing the work, obstructing the progress of the work, or getting involved in health and safety aspects of the work performed by DHA.
7. Authorizing no deviations from EPA-approved work plans or planning documents.
8. Undertaking no DHA responsibilities.
9. Providing no advice, issuing no directions regarding, or assuming no control over any aspect of the DHA activities for the OU No. 2 Removal Action.

It is important to CH2M HILL and EPA that oversight personnel maintain a monitoring/oversight role versus a directing or approval posture. DHA is responsible for executing the work as specified in the AOC and for determining and properly executing any needed changes or modifications.

### **Field Oversight Inspections**

This section provides information regarding the lines of communication, oversight logbooks, photograph logbooks, review of DHA documentation, sample splits, and reporting for field oversight activities of DHA's Removal Action activities at OU No. 2.

#### **Lines of Communication**

Communication procedures exist between oversight personnel and DHA, the EPA remedial project manager (RPM) for the OU No. 2, the news media or other outside parties, and the CH2M HILL site manager and appropriate support and management personnel.

All inquiries from the news media will be referred to the EPA RPM for responses.

Oversight personnel should coordinate with the DHA site manager (individual identified to direct the fieldwork onsite) regarding scheduling specific field activities. Oversight personnel making observations considered to be potential deviations from specified field procedures or questioning the appropriateness of observed procedures should perform the following:

1. Discuss the procedure(s) in question with the DHA site manager or appropriate representative and describe the communication in the field

logbook (that is, record who was present during the conversation along with the time, date, and substance of the communication).

2. Contact the CH2M HILL site manager and discuss the potential deviations or procedure in question. Depending upon the results of this discussion, a Potential Deviation Report should be sent to the EPA RPM.

In the event oversight personnel and the CH2M HILL site manager determine that a procedure used by DHA is a potential deviation, a Potential Deviation Report (Figure 2-1) will be communicated/transmitted to the EPA RPM (or designate) within 1 working day after it was observed.

### **Oversight Logbooks**

Oversight logbooks will be bound with pages consecutively numbered. Logbooks will be checked out from the CH2M HILL site manager at the beginning of each major phase of oversight activity. If multiple oversight personnel are on site, each observer will have a separate oversight logbook in their possession. Separate logbooks (from other OU activities) will be maintained for oversight of work related to this OU Removal Action. The logbooks will remain in the possession of oversight personnel or in a secured onsite area, or at CH2M HILL's Dallas office. Logbooks will be returned to the CH2M HILL site manager at the conclusion of each phase of field activity, or if oversight personnel changes.

The oversight logbook will be used for all oversight entries, except photographs. Photographic information will be entered into a photograph record file. Specific observations to be noted will vary depending on the type of field activity.

All entries must be made with permanent ink and each page must have the date and signature of the author. Field logbook errors will be corrected by drawing a single line through the error and initialing and dating the correction. Records should contain sufficient information so observations are clearly presented and understandable. Each individual who writes in the oversight logbook will date and sign their entry. The types of items included in the logbook will include the following:

- Name(s) of oversight personnel
- Date and time (start and finish of oversight)
- Type of activity being observed
- Sample location or description, such as location address and land use
- Names and titles of the DHA lead personnel performing work
- Description of observed activity in sufficient detail to evaluate compliance with EPA-approved work plans or planning documents
- Description of observed problems encountered by DHA and actions taken
- Description of observed significant procedural departure of DHA from EPA-approved work plans and planning documents
- Description of unusual or severe weather-related conditions that could influence the progress or quality of the work being performed
- Description of significant discussions with DHA or property owner, such as questions asked and the responses, including identification of

individuals present during the conversation and the time and date of the conversation

## **Photograph Logbooks**

Photographs taken by oversight personnel will be documented in a photograph record file. Documentation in the photograph record file will be in ink and will be signed and dated. A camera and film will be available to oversight personnel for visual documentation of significant events or objects. Film rolls will be consecutively numbered; the type of film and film ASA will be noted at the beginning of each roll of film. The number of photographs taken shall be kept to a minimum and used to the extent needed to document critical aspects of the work and potential deviations from EPA-approved work plans and planning documents.

The type of camera and lens will be entered in the photograph record file for each roll of film. Information to be provided in the photograph record file for each individual photograph taken is:

- Photograph (frame) number and roll number
- Date and time
- Photographer's name
- Location of photograph and direction photographer is facing
- Description of activity/object shown in photograph

This information will also be recorded on the back of the photograph and the individual who took the photograph will sign the photograph. No lens filters (except UV) or lenses other than a 35 or 55 mm shall be employed. When photographing objects closeup, a scale or other measuring device will be included in the photograph.

Two documented copies of each photograph will be made. CH2M HILL will maintain one set in the project files. The other copy, with documentation and the negatives, will be sent to EPA as part of the monthly oversight reports.

### **Review of DHA Field Documentation**

The AOC (Item 40, Draft AOC) allows oversight personnel to periodically inspect nonprivileged records, including sample tracking records (i.e., Chain-of-Custody forms, sample tags, etc.). Oversight personnel will not inform DHA of which paperwork will be inspected until DHA has completed a given set of paperwork and not until immediately prior to evaluating the documentation in question.

Periodically, field documentation collected by DHA should be reviewed for general content and adequacy of documentation and to document that DHA is following requirements of EPA-approved work plans and planning documents. The content and format of this field documentation will be described in the DHA FSP. At least once a week (if samples are collected), EPA oversight personnel will inspect a portion of sample paperwork (one complete sample) to determine if DHA procedures are in conformance with EPA-approved work plans and planning documents. Observations will be appropriately documented in field oversight logbooks.

### **Sample Splits**

The AOC (Item 41, Draft AOC) allows EPA to receive split samples at any time upon request. It is anticipated that EPA will choose to collect sample splits at various times during fieldwork under this Removal Action. Recommendations for splits will be made by CH2M HILL to EPA. After EPA approves the splits, CH2M HILL will inform DHA during site coordination meetings of specific silt samples to be collected. Details on the number of splits, the parameters to be analyzed, and the analytical procedures to be employed are described in the following paragraphs.



Sample splits will be collected at approximately a frequency of 10 percent for each type of sampling event. Sample splits will be collected for both the contamination removal sampling, the verification sampling, and the materials testing sampling. Additional sample splits may be collected at areas determined to be critical during field activities. At George Loving Place and the Boys Club property, an estimated 1,000 samples will be collected for delineating the extent of soil contamination and 750 samples will be collected for verification, as estimated in the Draft Removal Action Plan. Sample splits will be collected from approximately 100 locations for the contamination sampling and 75 locations for the verification sampling. The samples will be analyzed for total lead and arsenic.

At Kingsbridge Park, 25 samples for each type of sampling are estimated in the Draft Removal Action Plan. Sample splits will be collected from approximately three locations for the contamination sampling and three locations for the verification sampling. The samples will be analyzed for total cadmium, lead, and arsenic.

Ten percent of the samples collected for materials testing will also be collected as sample splits and analyzed for TCLP and total lead and arsenic.

The proposed sample splits are based on the Draft DHA Removal Action Work Plan and are provided as an example only. The specific sample splits will be based on the Final Removal Action Work Plan and field conditions.

The sample splits will be collected as described in the SAP (FSP and QAPP) developed by CH2M HILL. The CH2M HILL SAP will be based on the final SAP developed by DHA.

Appropriate lead time (approximately 4 weeks) is required to coordinate sample collections with the EPA Sample Management Office (SMO). Oversight personnel will coordinate upcoming sampling schedules with the DHA contractor and inform the SMO of estimated silt sample collection dates.

## **Oversight Reports**

It is important that the oversight activities are documented in a manner sufficient for EPA to determine that the fieldwork is performed as required by EPA-approved work plans and planning documents and also to identify potential problems so they may be rectified early. The following written reports will be prepared:

- Daily Summary Reports
- Monthly Oversight Reports

At the end of each day in which field oversight occurs, oversight personnel will complete a Daily Summary Report (Figure 2-2). The report contains space for the following entries:

- Date
- Name of oversight personnel
- Highest level of personal health and safety protection
- Number of hours of the work day covered by oversight personnel
- Description and schedule of activities performed by DHA
- Description of activities observed by oversight personnel
- Observed deviations from EPA-approved work plans or planning documents
- Summary of significant communications with DHA or others

- Coordination problems with the DHA field personnel
- Follow-up items for EPA (potential deviations, access problems, working relationships, recommendations for technical changes in procedures)
- Description of samples/measurements taken by oversight personnel
- Other information, as appropriate

Monthly oversight reports will also be prepared summarizing general activities performed during a calendar month. The reports will include one documented copy of the photographs and their negatives taken during oversight. The reports will include the following:

- Overview/summary of the DHA fieldwork overseen and covered in the monthly report
- Summary of potential deviations communicated to EPA
- Changes in procedures due to potential deviations
- Recommendations made for changes in technical approach and whether the changes were incorporated and sufficient
- Summary of sample splits collected and field measurements taken
- General descriptions of working relationship with DHA
- Summary of major technical issues and potential impact on quality of this Removal Action

- Summary of field personnel used and the time each spent in the field
- Access issues
- Daily Summary Reports

Draft reports will be submitted to EPA within 2 weeks after the end of the month. The monthly oversight reports will be finalized after receipt of EPA comments.

### **Health and Safety**

A health and safety plan (HSP) will be developed for the oversight activities. It is the responsibility of oversight personnel to read and abide by the HSP and amendments. The DHA contractors will perform fieldwork and provide monitoring for health and safety purposes. CH2M HILL field oversight personnel will obey all health and safety directives of the DHA's contractors to the extent that the conditions, if warranted, do not interfere with oversight activities, as well as conform to CH2M HILL's health and safety plan.

Oversight personnel are responsible for having their own required personal protective equipment (PPE) at the work site.

Oversight personnel must complete a 40-hour Hazardous Waste Site Investigation Training course, American Red Cross Multimedia Standard First Aid and Basic Life Support course, and Red Cross or American Heart Association CPR course. In addition, oversight personnel must be in a current medical monitoring program. The documentation of these training requirements will be in possession of the CH2M HILL field oversight personnel.

## **Quality Control**

### **Review of Oversight Documentation**

Copies of all logbook entries sent to the CH2M HILL site manager will be reviewed to determine if the field oversight objectives, as described in this plan, are being accomplished. The site manager will provide the field oversight personnel with the feedback or necessary changes to oversight procedures and documentation. The site manager will also discuss with the EPA RPM potential changes to oversight activities based on the field implementation.

### **Field Visits**

The site manager will make periodic visits to the site to observe operations and discuss issues with the CH2M HILL field oversight personnel and the DHA's contractors. The purpose of the field visits is to provide quality control reviews by the CH2M HILL site manager. These visits and associated followup will be documented in the oversight field logbooks.

### **Site Access**

As stated in the AOC (Item 42, Draft AOC), EPA and EPA representatives (oversight personnel) will have access to the field areas. The AOC states that at all reasonable times and subject to the compliance of the Site Health and Safety Plan, EPA and its authorized representatives will have the authority to enter and freely move about all property at the site and offsite areas for the express purposes of inspecting conditions, activities, and records.

**Section 4**  
**References**

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**Section 4**  
**References**

Draft RSR Corporation Site, OU No. 2, Administrative Order on Consent for RI/FS and Removal Action.

Remedial Investigation Work Plan for Dallas Housing Authority's West Dallas Development. CDM. March 1993.

Removal Action Plan for Dallas Housing Authority. CDM. February 1993.